

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: RURAL IOWA INDEPENDENT TELEPHONE ASSOCIATION AND IOWA TELECOMMUNICATIONS ASSOCIATION; ALPINE COMMUNICATIONS, L.C., ET AL.; AND COON VALLEY COOPERATIVE TELEPHONE ASSOCIATION, INC., ET AL.	DOCKET NOS. SPU-04-3 SPU-04-5 SPU-04-6
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FINAL DECISION AND ORDER

(Issued October 6, 2004)

PROCEDURAL HISTORY

On February 18, 2004, the Rural Iowa Independent Telephone Association (RIITA) and Iowa Telecommunications Association (ITA) filed with the Utilities Board (Board) a "Joint Petition for Suspension of Intermodal Number Portability Requirements for Iowa Two Percent Carriers," pursuant to 47 U.S.C. § 251(f)(2) and Iowa Code § 476.1 (2003), requesting that the Board suspend or modify the federal requirements relating to intermodal number portability (IMNP) for all Iowa local exchange carriers (LECs) serving fewer than 2 percent of the nation's subscriber lines. Generally speaking, "intermodal number portability" is the ability to port telephone numbers between wireline and wireless telecommunications service providers. The petition has been identified as Docket No. SPU-04-3.

On March 9, 2004, Alpine Communications, L.C., and 15 other LECs¹ (collectively referred to as "Alpine Companies") filed a joint "Petition for Suspension of Intermodal Number Portability Requirements" pursuant to 47 U.S.C. § 251(f)(2) and Iowa Code § 476.1, requesting that the Board suspend or modify the federal requirements relating to IMNP with respect to the Alpine Companies. In support of their petition, the Alpine Companies state that they are rural telephone companies in Iowa that serve fewer than 2 percent of the nation's subscriber lines. The petition has been identified as Docket No. SPU-04-5.

Also on March 9, 2004, Coon Valley Cooperative Telephone Association, Inc., and nine additional LECs² (collectively referred to as "Coon Valley Companies") filed a joint "Petition for Suspension of Intermodal Number Portability Requirements" pursuant to 47 U.S.C. § 251(f)(2) and Iowa Code § 476.1, requesting that the Board suspend or modify the federal requirements relating to IMNP with respect to the Coon Valley Companies. In support of their petition, the Coon Valley Companies state that they are rural telephone companies in Iowa with central office switches manufactured

¹ The Alpine Group consists of the following companies: Alpine Communications, L.C., Ayrshire Farmers Mutual Telephone Co., Clear Lake Independent Telephone Co., Cooperative Telephone Co., Dumont Telephone Company, Hills Telephone Company, Independent Networks, Liberty Communications, Lone Rock Cooperative Telephone Co., Marne & Elk Horn Telephone Co., Ringsted Telephone Co., Royal Telephone Co., Schaller Telephone Co., Universal Communications of Allison, Ventura Telephone Co., and Western Iowa Telephone.

² The Coon Valley Group consists of the following companies: Coon Valley Cooperative Telephone Association, Inc., Farmers Mutual Telephone Co., Fenton Cooperative Telephone Co., Modern Cooperative Telephone Co., Northwest Telecommunications Cooperative Association, Palmer Mutual Telephone Co., River Valley Telephone Cooperative, Terril Telephone Cooperative, Titonka-Burt Communications, and Van Horne Co-op Telephone Co.

by MITEL, which will not support maintenance for local number portability (LNP) after December 31, 2007. In addition, the Coon Valley Companies state that they serve fewer than 2 percent of the nation's subscriber lines. The petition has been identified as Docket No. SPU-04-6.

Federal law requires that each local exchange carrier provide number portability, pursuant to 47 U.S.C. § 251(b)(2). However, Federal law also gives the Board the authority to suspend or modify that requirement. Specifically, 47 U.S.C. § 251(f)(2) provides as follows:

A local exchange carrier with fewer than 2 percent of the Nation's subscriber lines installed in the aggregate nationwide may petition a State commission for a suspension or modification of the application of a requirement or requirements of subsection (b) or (c) to telephone exchange service facilities specified in such petition. The State commission shall grant such petition to the extent that, and for such duration as, the State commission determines that such suspension or modification—

(A) is necessary

- (i) to avoid a significant adverse economic impact on users of telecommunications services generally;
- (ii) to avoid imposing a requirement that is unduly economically burdensome; or
- (iii) to avoid imposing a requirement that is technically infeasible; and

(B) is consistent with the public interest, convenience, and necessity.

The State commission shall act upon any petition filed under this paragraph within 180 days after receiving such petition.

Pending such action, the State commission may suspend enforcement of the requirement or requirements to which the petition applies with respect to the petitioning carrier or carriers."

On April 23, 2004, the Board issued an "Order Consolidating Dockets, Establishing Procedural Schedule, Granting Stay, and Granting Interventions." In that order, the Board consolidated the three petitions into a single proceeding and granted the petitioners a temporary stay of the number portability requirement pending the completion of this proceeding. The Board also granted intervenor status to Sprint Corporation on behalf of its wireless division, Sprint Spectrum, L.P., d/b/a Sprint PCS (Sprint); NPCR, Inc., d/b/a Nextel Partners (Nextel); and WWC License, LLC, Verizon Wireless, and U.S. Cellular Corporation, jointly appearing as the Wireless Coalition for Intermodal Portability (Wireless Coalition).

Pursuant to the procedural schedule established in this combined docket, RIITA, ITA, the Alpine Companies, and the Coon Valley Companies filed direct testimony on June 1, 2004. Wireless Coalition filed direct testimony on June 28, 2004. Sprint filed direct testimony on July 1, 2004, and on July 22, 2004, the Board issued an order allowing Sprint's late-filed testimony to be admitted. RIITA, ITA, the Alpine Companies, and the Coon Valley Companies filed rebuttal testimony on July 14, 2004.

A hearing for the purpose of receiving testimony and cross-examination of all testimony was held on August 10, 2004. At the conclusion of the hearing, the Board requested that the parties file simultaneous briefs. Briefs were submitted by RIITA,

ITA, the Alpine Companies, the Coon Valley Companies, Sprint, and the Wireless Coalition pursuant to that request.

DISCUSSION

A. Federal Law

Section 251(b)(2) of the Telecommunications Act of 1996 (1996 Act) provides that each local exchange carrier has the duty to provide number portability to the extent it is technically feasible. The Federal Communications Commission (FCC) implemented and explained this requirement as it applies to intermodal (e.g., wireline-to-wireless) portability in an order issued November 10, 2003, in which the FCC requires that

LECs must port numbers to wireless carriers where the requesting wireless carrier's 'coverage area' overlaps the geographic location of the rate center in which the customer's wire line is provisioned, provided that the porting in carrier maintains the number's original rate center designation following the port.

See "Order," In re: Telephone Number Portability, CC Docket No. 95-116, ¶ 22 (Nov. 10, 2003). The deadline for complying with the FCC requirement depends upon the size of the carrier and the size of the market served. Initially, all LECs serving the top 100 Metropolitan Statistical Areas (MSAs) were required to offer intermodal number portability in those markets by November 23, 2003, while all other LECs were given an additional six months, to May 24, 2004, to comply. By order released January 16, 2004, the FCC extended the deadline for LECs serving less

than 2 percent of the nation's subscriber lines to provide wireless local number portability in the top 100 MSAs to May 24, 2004, as well.

As previously noted, state commissions have the authority to suspend or modify these porting requirements, pursuant to 47 U.S.C. § 251(f)(2). Thus, the issue before the Board, broadly stated, is whether the petitioners have shown they are entitled to suspension or modification of the number portability requirement pursuant to the statutory standards.

Based on the language of 47 U.S.C. § 251(f)(2)(A), the Board must first determine whether a suspension or modification of the LNP requirements is necessary to avoid imposing a significant adverse economic impact on users of telecommunications services, or to avoid imposing an undue economic burden on the petitioners, or to avoid imposing a requirement that is technically infeasible. Also, in accordance with § 251(f)(2)(B), the Board must determine whether a suspension or modification of the LNP is in the public interest.

B. Consideration of Statutory Factors

1. Whether intermodal local number portability is technically infeasible.

The record is clear that the technology is available for the petitioners to implement LNP. The Board recognizes the petitioners' arguments that without an interconnection agreement between rural LECs and wireless carriers, it is technically infeasible to deliver ported calls. However, the Board takes note of the fact that many interconnection agreements involving rural LECs and wireless carriers have

been filed with the Board in recent months and the Board continues to receive these agreements for approval. (See Petitioners' Exhibit 306). With the availability of these interconnection agreements, the petitioners' arguments regarding technical infeasibility become moot. Therefore, the Board finds that it is technically feasible for the petitioners to implement LNP and will focus its analysis on the economic and public interest factors.

2. Economic factors and the public interest.

The first of the economic factors is whether the suspension or modification of LNP requirements "is necessary . . . to avoid a significant adverse economic impact on users of telecommunications services generally." 47 U.S.C. § 251(f)(2)(A)(i). The second economic factor is whether the suspension or modification "is necessary . . . to avoid imposing a requirement that is unduly economically burdensome." 47 U.S.C. § 251(f)(2)(A)(ii). The third and final factor to consider is whether the suspension or modification of LNP requirements is in the public interest. 47 U.S.C. § 251(f)(2)(B).

In all, there are 147 companies petitioning for suspension or modification of intermodal LNP requirements in this combined docket; 16 companies are members of the Alpine Group, ten are members of the Coon Valley Group, and the remaining 121 companies are represented by RIITA and ITA. The ten companies represented by the Coon Valley Group differ from those companies represented by the Alpine Group, RIITA, and ITA in that these companies have central office switches that are

manufactured by MITEI, which has announced that it will not support LNP after December 31, 2007.

In the course of this proceeding, only 26 of the petitioning companies (the Alpine Group and Coon Valley Group) voluntarily submitted LNP cost data. The remaining 121 companies intended to rely on the cost data submitted by the group members as representing "a good sampling of the rural carriers in Iowa." (Tr. 21.) On July 23, 2004, the Board issued an "Order Requiring Additional Information and Setting Pre-Hearing Conference," which required that all petitioning companies submit LNP cost estimates. The cost estimates from all 147 companies were submitted into the record as Exhibit 2 and the Board will rely on that data in reaching its decision.

Based on the aforementioned factors and the extensive record in this case, the Board has determined that for many of these companies, suspension or modification of intermodal LNP requirements is consistent with the public interest and is necessary to avoid a significant adverse economic impact on users of telecommunications services generally and to avoid imposing a requirement that is unduly economically burdensome.

In making this determination, the Board is considering a variety of factors for each company, including the projected cost per customer, the number of wireless carriers providing service in the exchanges served by the company, the likely value of thousands-block number pooling (TBNP) in the affected exchange or exchanges, and the presence or absence of a MITEI switch. In some cases, other factors were also

considered; for example, recent transfers of certificates to serve certain exchanges may mean that additional time is required to complete intermodal LNP implementation in an efficient manner in those exchanges.

a) Projected cost to customers.

The projected cost per customer is relevant to the question of whether suspension is necessary "to avoid a significant adverse economic impact on users of telecommunications services generally." 47 U.S.C. § 251(f)(2)(A)(i). The petitioners' evidence shows that costs per customer as reflected in LNP surcharges will range from \$0.18 to \$12.72 per line per month. Pursuant to current rules, the FCC allows incumbent carriers to recover the incremental cost of LNP implementation through utilization of a line-item surcharge on local telecommunications customers for a period of five years.³ Petitioners argue that any cost over \$0.43 per line per month (the charge currently implemented by Qwest Corporation for LNP implementation in its Iowa exchanges) would be a significant adverse economic impact because the federal law should be interpreted to require LNP implementation in rural areas when its cost is equal to or less than the cost of providing LNP in urban areas, in order to preserve comparability of service and rates. (Tr. 40.)

³ See 47 CFR 52.33(a).

b) Number of wireless carriers providing service.

The number of wireless carriers providing service in the exchanges of the local exchange carriers is relevant as an indicator of where the demand for intermodal LNP is likely to be greatest. This measure of demand is relevant to the public interest factor of § 251(f)(2)(B). Federal law requires that all local exchange carriers provide number portability in accordance with the requirements of the FCC. 47 U.S.C. § 251(b)(2). Implicit in this requirement is a finding that number portability is in the public interest because, among other reasons, intermodal number portability will enhance competition by enabling customers to change local service providers without having to change their telephone numbers. Thus, it follows that intermodal number portability will have the greatest benefit in exchanges in which wireless carriers are attempting to compete with the wireline carrier. On this record, these exchanges can best be identified by the wireless coverage information submitted by intervening wireless carriers.

c) Thousands-block number pooling.

The value of TBNP is a factor of somewhat lesser significance in the Board's decision. TBNP is not the same as intermodal LNP, but they are related services. TBNP allows multiple local exchange carriers to share a single block of 10,000 telephone numbers when competing to serve customers in the same exchange. In the absence of TBNP, each carrier must obtain its own block of 10,000 numbers, which can be wasteful of telephone numbering resources, especially in smaller exchanges with fewer than 10,000 total access lines. Typically, implementation of

intermodal LNP will also involve TBNP, which can be very useful in preserving telephone numbering resources when multiple facilities-based companies serve a community. The availability of TBNP is therefore related to the public interest factor of § 251(f)(2)(B). The Board finds it is generally in the public interest to require that TBNP be implemented along with LNP on a schedule that is consistent with the efficiency and financial constraints represented by the other factors.

Little or no information is readily available regarding the market entry plans of facilities-based competitive carriers, but it is reasonable to conclude that the presence of an independent cable television system in a town demonstrates the possibility of facilities-based competition in that town. Cable television systems are beginning to roll out competitive telecommunications services using their existing cable networks. The presence of an independent cable television system is therefore indicative of places where TBNP is more likely to be beneficial in the relatively near future. Because TBNP and intermodal LNP are often implemented together, these are also exchanges where any suspension of intermodal LNP requirements should be kept at a minimum, in order to protect the public interest.

d) Balancing the factors

As discussed above, there are a number of factors the Board must consider in deciding whether to suspend or modify the intermodal number porting obligation and, if the answer is "yes," to determine how long the suspension or modification should be. Sometimes, the various factors support different conclusions; in those cases, the Board must balance the factors to arrive at a reasonable result.

To determine a length of suspension or modification of the LNP requirements that is appropriate to each petitioning company, the Board has considered each of these factors, and others as appropriate, and created a staggered schedule for the implementation of intermodal LNP for the 147 petitioning companies. This schedule divides the petitioners into five groups based on specific criteria and has given each group a different deadline to implement LNP. The individual groups and determining criteria are discussed in detail below and a list of the groups is attached to this order as "Attachment A" and is incorporated herein by this reference.

i) Group One – Six-Month Suspension

Group One consists of those 87 petitioners that have three or more wireless carriers providing service in their service areas, or have an independent cable television system in their service areas, or have LNP implementation costs per line per month of \$1 or less, and do not have a MITEL switch. The 87 companies in Group One are identified in Attachment "A." Group One will receive a six-month suspension of the intermodal LNP requirements. As previously discussed, the Board finds that the presence of several wireless carriers, or the existence of an independent cable television system in a company's service area, can be an important public policy consideration. These facts demonstrate at least the possibility of significant intermodal competition in the near future. Under these circumstances, the public interest supports more rapid implementation of LNP. The Board also finds that when the projected surcharges for LNP implementation, as submitted by the petitioners, is equal to or less than \$1, the surcharge represents an adverse impact

on users or an economic burden on the company that is sufficient to justify, at most, a six-month suspension from the date of this order.

As described above, most of these carriers serve exchanges in which several of the wireless carriers have requested intermodal number portability. Thus, these are exchanges in which the public interest in implementing intermodal LNP is strong. Moreover, the projected surcharges are relatively low, such that the economic burdens are also relatively low. In this respect, the Board rejects the petitioners' argument that any surcharge in excess of the \$0.43 Qwest surcharge is an undue economic burden on telecommunications users. To support such an argument, petitioners would have to compare not just the surcharges, but also the resulting overall bills, to make a complete comparison. If, for example, a petitioner's basic residential service rate is \$10 per month, while Qwest's comparable rate is \$12.65 per month, then it would appear that the petitioner can implement a somewhat higher surcharge without raising significant concerns regarding comparability of overall rates. In the absence of a total bill comparison, the petitioners' argument regarding comparability is unsupported by the evidence.

ii) Group Two – 12-Month Suspension

Group Two consists of those 24 petitioners that have fewer than three wireless carriers providing service in their service areas, do not have the presence of an independent cable television system in their service areas, have projected LNP surcharges per month of more than \$1, and do not have a MITEL switch. Group Two will receive a 12-month suspension of the intermodal LNP requirements.

The Board finds that the relatively smaller number of active wireless carriers and the absence of an independent cable television system in these petitioners' service areas reduces the public interest in immediate implementation of intermodal LNP. The Board also finds that when the customer surcharge for LNP implementation (as submitted by the petitioners) is more than \$1 per month, it may be considered a relatively more significant adverse impact on users of telecommunications services as well as a greater economic burden to those petitioners, even in the absence of a total bill comparison. However, it is not sufficient to justify a permanent suspension; LNP is a requirement of Federal law and must be implemented at some time. The statute allows the Board to suspend the requirement, not waive it. The Board finds that a 12-month suspension is reasonable for this group and should allow the companies in this group an opportunity to observe the implementation by the companies in Group One and learn from their experience. This may allow the Group Two companies to reduce their LNP implementation costs by sharing some costs, for example. (Tr. 320-25.) The 12-month suspension will also bring the date of more widespread wireless deployment and other forms of competition closer, all of which will make the public interest in intermodal LNP even greater.

iii) Group Three – MITEL switches and existence of wireless carriers or independent cable.

Group Three generally consists of those 22 petitioners that have MITEL switches and have one or more wireless carriers providing service in their service

areas or have the presence of an independent cable television system in their service areas. Based on the testimony in the record, the future of the MITEL switches may be characterized as uncertain, at best. The record indicates that many of the MITEL switches are likely to be replaced by the end of 2007 because MITEL will not support the switches beyond that date. (Tr. 367; 375.) The record also indicates the possibility that a third-party may enter the market to maintain the switches in place of MITEL, which could allow carriers to postpone replacement of the switch. (Tr. 376.) Either way, the record indicates that it is uncertain whether all MITEL companies would replace their switches before the end of 2007. (Tr. 311.) Thus, it is impossible to say at this time exactly when the MITEL switches will be replaced, but near-term replacement is a likely alternative for many of them.

The Board finds that it would be an inefficient use of resources to upgrade facilities that are likely to be replaced in the near future. This waste of resources would not be consistent with the public interest factor of § 251(f)(2)(B). At the same time, however, it is not clear that all of these switches will be replaced by the end of 2007. Due to this uncertainty, Group Three will be given an 18-month suspension of the LNP requirements, which should be sufficient time for the MITEL situation to be resolved. However, if a petitioner in Group Three replaces its MITEL switch within the 18-month time frame, the new switch must be LNP-capable at the time of the replacement.

Group Three includes Partner Communications Cooperative (Partner) and Heart of Iowa Communications Cooperative (Heart of Iowa). While Partner and Heart

of Iowa do not have MITELE switches, they have recently purchased exchanges from Iowa Telecommunications Services, Inc., d/b/a Iowa Telecom (Iowa Telecom).⁴ (Exhibit 2). Partner and Heart of Iowa seek a suspension to allow time to upgrade or replace the switches in these former Iowa Telecom exchanges. The Board will grant Partner and Heart of Iowa an 18-month suspension to upgrade or replace the switches in the recently-purchased exchanges and implement LNP.

Group Three also includes Laurel Telephone Company (Laurel). Laurel does not use a MITELE switch. However, Laurel is currently being served by Heart of Iowa's switch. (Exhibit 2). As previously discussed, Heart of Iowa will receive an 18-month suspension of the LNP requirements. Therefore, Laurel will receive a similar suspension.

iv) Group Four – MITELE switches, no wireless carriers, or independent cable.

Group Four consists of five petitioners that have MITELE switches, have no wireless carriers providing service in their service areas, and do not have an independent cable television system in their service areas. Group Four will be granted a suspension until the earlier of: (a) replacement of their MITELE switch or (b) after an initial 18-month suspension, within six months after receiving a BFR for intermodal LNP. Further, if a petitioner in this group receives a BFR but has established a date certain for replacement of its MITELE switch that is beyond the six-

⁴ Partner has purchased the Baxter, Rhodes, Melbourne, and State Center, Iowa, exchanges from Iowa Telecom; Heart of Iowa has purchased the Eldora, Conrad, and Steamboat Rock, Iowa, exchanges from Iowa Telecom.

month deadline, that petitioner may seek an extension of the six-month time frame to meet its date for switch replacement.

When a wireless carrier submits a BFR to a carrier in Group Four, the wireless carrier shall also file a copy of the BFR with the Board, along with an affidavit signed by a company officer that describes the company's build-out plans for that exchange and showing that wireless service is expected to be available in the exchange where the BFR is submitted within a reasonable period of time. This information will assist the Board in monitoring and enforcing this suspension.

v) Group Five – No near-term wireless service or independent cable.

Group Five consists of the remaining nine petitioners that, on this record, have no wireless carriers providing service in their service areas and no independent cable television systems in their service areas. Group Five will be granted a suspension requiring them to implement intermodal number portability within six months of receiving a BFR. Again, the Board will require that any carrier submitting a BFR to a carrier in Group Five also file a copy of the BFR with the Board. If the carrier submitting the BFR is a wireless carrier, the filing should include an affidavit signed by a company officer describing the company's build-out plans and showing that wireless service is expected to be available in the exchange where the BFR is requested within a reasonable period of time.

C. Other Matters

Finally, the Board will require that each petitioner making a filing with the FCC for approval of an LNP surcharge pursuant to 47 C.F.R. 52.33(a) must also submit a copy of that request to the Board by letter to the Executive Secretary. The Board will also require a similar notification when the LNP surcharge is implemented. This information will allow the Board to track the surcharges and, therefore, to monitor the potential adverse economic impact on users of telecommunications services.

The Board will request that each petitioner provide a similar letter notifying when the petitioner implements TBNP and donates numbers to the pool. While this information is not directly related to IMNP, it will be helpful to the Board in its number conservation efforts.

ORDERING CLAUSE

IT IS THEREFORE ORDERED:

The requests for suspension and modification of the requirement to implement local number portability filed by Rural Iowa Independent Telephone Association and Iowa Telecommunications Association on February 18, 2004, by Alpine Communications, L.C., and 15 other local exchange carriers and by Coon Valley Cooperative Telephone Association and nine other local exchange carriers on March 9, 2004, are granted pursuant to 47 U.S.C. § 251(f)(2), as follows:

- a. Group One (as shown on Attachment "A," incorporated herein by this reference) will be given a six-month extension of the FCC's local number portability requirements as described in this order;
- b. Group Two will be given a 12-month extension of the FCC's local number portability requirements as described in this order;
- c. Group Three will be given a maximum 18-month extension of the FCC's local number portability requirements, subject to possible further extension, as described in this order;
- d. Group Four will be given a maximum 18-month extension of the FCC's local number portability requirements, subject to possible further extension, as described in this order; and,
- e. Group Five will be given an extension of the FCC's local number portability requirements as described in this order.

UTILITIES BOARD

/s/ Diane Munns

/s/ Mark O. Lambert

ATTEST:

/s/ Judi K. Cooper
Executive Secretary

/s/ Elliott Smith

Dated at Des Moines, Iowa, this 6th day of October, 2004.

ATTACHMENT "A"

Group One – Six-Month Suspension

1. ACE TELEPHONE ASSN.
2. ALPINE COMMUNICATIONS. L.C.
3. ANDREW TELEPHONE CO.
4. ATKINS TELEPHONE CO.
5. BERNARD TELEPHONE CO.
6. BRED A TELEPHONE CO.
7. CASCADE TELEPHONE CO.
8. CASEY MUTUAL TELEPHONE CO.
9. CENTRAL SCOTT TELEPHONE CO.
10. CITIZENS MUTUAL TELEPHONE CO.
11. CLARENCE TELEPHONE CO.
12. CLARKSVILLE TELEPHONE CO.
13. CLEAR LAKE TELEPHONE CO.
14. COLO TELEPHONE COMPANY
15. COOPERATIVE TELEPHONE CO.
16. COOPERATIVE TELEPHONE EXCHANGE
17. CUMBERLAND TELEPHONE CO.
18. DANVILLE MUTUAL TELEPHONE CO.
19. DIXON TELEPHONE CO.
20. DUNKERTON TELEPHONE COOPERATIVE
21. EAST BUCHANAN TELEPHONE CO.
22. ELLSWORTH COOPERATIVE TELEPHONE ASSN.
23. FARMERS' & BUSINESS MENS' TELEPHONE CO.
24. FARMERS & MERCHANTS MUTUAL TEL. CO.
25. FARMERS COOPERATIVE TELEPHONE CO. - DYSART
26. FARMERS MUT COOPERATIVE TEL. CO. - HARLAN
27. FARMERS MUT. TELEPHONE CO. - SHELLSBURG
28. FARMERS MUTUAL TELEPHONE CO. - JESUP
29. GRAND MOUND COOPERATIVE TELEPHONE CO.
30. GRAND RIVER MUTUAL TELEPHONE CO.
31. GRISWOLD COOPERATIVE TELEPHONE CO.
32. HEARTLAND TELECOMMUNICATIONS COMPANY
33. HILLS TELEPHONE COMPANY
34. HUXLEY COMMUNICATIONS COOPERATIVE
35. JEFFERSON TELEPHONE CO.
36. KALONA COOPERATIVE TEL CO.
37. LA PORTE CITY TELEPHONE CO.

38. LAMOTTE TELEPHONE CO.
39. LEHIGH VALLEY COOPERATIVE TELEPHONE ASSN.
40. LIBERTY COMMUNICATIONS
41. LONE ROCK COOP TELEPHONE CO.
42. LOST NATION-ELWOOD TELEPHONE CO.
43. LYNVILLE COMMUNICATIONS TELEPHONE CO.
44. MABEL COOPERATIVE TELEPHONE CO.
45. MARNE & ELK HORN TELEPHONE CO.
46. MARTELLE COOPERATIVE TELEPHONE ASSN.
47. MASSENA TELEPHONE CO.
48. MECHANICSVILLE TELEPHONE CO.
49. MEDIAPOLIS TELEPHONE CO.
50. MILES CO-OP TELEPHONE CO.
51. MILLER TELEPHONE CO.
52. MINBURN TELECOMMUNICATIONS
53. MINBURN TELEPHONE CO.
54. MONTEZUMA MUTUAL TELEPHONE CO.
55. MUTUAL TELEPHONE CO. OF MORNING SUN
56. NORTHERN IOWA TELEPHONE CO.
57. NORTHWEST IOWA TELEPHONE CO.
58. OGDEN TELEPHONE CO.
59. OLIN TELEPHONE CO.
60. OMNI TEL COMMUNICATIONS
61. PALO COOPERATIVE TELEPHONE ASSN.
62. PANORA COOPERATIVE TELEPHONE ASSN.
63. PEOPLES TELEPHONE CO.
64. PRAIRIE TELEPHONE COMPANY
65. PRAIRIEBURG TELEPHONE CO.
66. PRESTON TELEPHONE CO.
67. RADCLIFFE TELEPHONE CO.
68. READLYN TELEPHONE CO.
69. ROCKWELL COOPERATIVE TELEPHONE ASSN.
70. SCHALLER TELEPHONE CO.
71. SEARSBORO TELEPHONE CO.
72. SHARON TELEPHONE CO.
73. SHELL ROCK TELEPHONE COMPANY
74. SOUTH CENTRAL COMMUNICATIONS, INC.
75. SOUTH SLOPE COOPERATIVE TELEPHONE CO.
76. SPRINGVILLE COOPERATIVE TEL. ASSN. INC.
77. SULLY TELEPHONE ASSN.

78. SWISHER TELEPHONE CO.
79. VAN BUREN TELEPHONE COMPANY, INC.
80. VENTURA TELEPHONE CO.
81. WEBSTER-CALHOUN COOP. TELEPHONE ASSN.
82. WESTEL SYSTEMS
83. WESTERN IOWA TEL ASSN.
84. WINNEBAGO COOP TEL. CO.
85. WOOLSTOCK MUTUAL TELEPHONE CO.
86. WTC COMMUNICATIONS
87. WYOMING MUTUAL TELEPHONE CO.

Group Two – Twelve-Month Suspension

1. BARNES CITY COOPERATIVE TELEPHONE CO.
2. BUTLER-BREMER MUTUAL TELEPHONE CO.
3. C-M-L TELEPHONE COPPERATIVE ASSN.
4. COMMUNICATIONS 1 NETWORK
5. COON CREEK TELEPHONE CO.
6. DUMONT TELEPHONE CO.
7. FARMERS MUTUAL COOP TELEPHONE CO. - MOULTON
8. FARMERS TELEPHONE CO. - ESSEX
9. FARMERS TELPHONE CO. - BATAVIA
10. GOLDFIELD TELEPHONE CO.
11. HAWKEYE TELEPHONE CO.
12. HOSPERS TELEPHONE CO.
13. HUBBARD COOPERATIVE TELEPHONE ASSN.
14. IAMO TELEPHONE COMPANY
15. JORDAN SOLDIER VALLEY TELEPHONE CO.
16. KEYSTONE COMMUNICATIONS
17. MUTUAL TELEPHONE CO. - SIOUX CENTER
18. NORTH ENGLISH COOPERATIVE TELEPHONE CO.
19. NORTHEAST IOWA TELEPHONE CO.
20. STRATFORD MUTUAL TELEPHONE CO.
21. TEMPLETON TELEPHONE CO.
22. VILLISCA FARMERS TELEPHONE CO.
23. WELLMAN COOPERATIVE TELEPHONE CO.
24. WESTSIDE INDEPENDENT TELEPHONE CO.

Group Three – Eighteen-Month Suspension, Unless a MITEL switch is replaced within the 18-month time frame, at which time, the new switch shall be LNP-capable at the time of the replacement

1. ARCADIA TELEPHONE COOPERATIVE
2. BALDWIN-NASHVILLE TELEPHONE CO.
3. BROOKLYN MUTUAL TELEPHONE CO.
4. CENTER JUNCTION TELEPHONE CO.
5. COON VALLEY COOPERATIVE TELEPHONE ASSN.
6. CORN BELT TELEPHONE CO.
7. FARMERS MUT. TELEPHONE CO. - STANTON
8. HEART OF IOWA COMMUNICATIONS COOPERATIVE*
9. INTERSTATE COMMUNICATIONS.
10. LAUREL TELEPHONE CO**
11. MINERVA VALLEY TELEPHONE CO.
12. MODERN COOPERATIVE TELEPHONE CO.
13. NORTHWEST TELEPHONE CO-OP ASSN.
14. ONSLOW COOPERATIVE TELEPHONE ASSN.
15. ORAN MUTUAL TELEPHONE CO.
16. PARTNER COMMUNICATIONS COOPERATIVE*
17. SAC COUNTY MUTUAL TELEPHONE CO.
18. SCRANTON TELEPHONE CO.
19. SOUTHWEST TELEPHONE EXCH.
20. TITONKA-BURT COMMUNICATIONS
21. VAN HORNE CO-OP TELEPHONE CO.
22. WALNUT TELEPHONE COMPANY

* Heart of Iowa and Partner Communications purchased exchanges from Iowa Telecom and will replace or upgrade all switches.

** Laurel Telephone is served by Heart of Iowa's switch and cannot provide LNP until Heart of Iowa is LNP capable.

Group Four-- Eighteen-Month Suspension, unless a MITEL switch is replaced within the 18-month time frame, at which time, the new switch shall be LNP-capable at the time of the replacement. If one of these companies receives a BFR within the 18-month time frame, but has established a date certain for replacement of its MITEL switch, that company may seek an extension of the 6-month time frame to meet its date for switch replacement.

1. FENTON COOP TELEPHONE CO.
2. PALMER MUTUAL TELEPHONE CO.
3. RIVER VALLY TELEPHONE COOPERATIVE
4. RUTHVEN TELEPHONE EXCHANGE
5. TERRIL TELEPHONE COOPERATIVE

Group Five – Suspension until 6-months after receiving a Bona Fide Request

1. AYRSHIRE FARMERS MUTUAL TELEPHONE CO.
2. HARMONY TELEPHONE CO.
3. INDEPENDENT NETWORKS
4. RINGSTED TELEPHONE CO.
5. ROYAL TELEPHONE CO.
6. SUPERIOR TELEPHONE COOPERATIVE
7. UNITED FARMERS TELEPHONE CO.
8. UNIVERSAL COMM OF ALLISON
9. WEBB-DICKENS TELEPHONE CO.